

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>FIELDWOOD ENERGY III LLC, et al.,</b>	§	<b>Case No. 20-33948 (MI)</b>
	§	
	§	<b>(Jointly Administered)</b>
<b>Post-Effective Date Debtors.<sup>1</sup></b>	§	

**CERTIFICATE OF COUNSEL TO PLAN ADMINISTRATOR'S EIGHTH OMNIBUS  
OBJECTION TO CLAIMS PURSUANT TO SECTION 502(b) OF THE BANKRUPTCY  
CODE AND RULE 3007 OF THE FEDERAL RULES OF BANKRUPTCY  
PROCEDURE SEEKING TO DISALLOW CERTAIN CLAIMS  
(Related Docket No. 2319)**

The undersigned hereby certifies as follows:

1. On December 23, 2021, the *Plan Administrator's Eighth Omnibus Objection To Claims Pursuant To Section 502(B) Of The Bankruptcy Code And Rule 3007 Of The Federal Rules Of Bankruptcy Procedure Seeking To Disallow Certain Claims (Late Filed Claims)* [Docket No. 2319] (the "Eighth Omnibus Objection") was filed with the Court by the administrator of the chapter 11 plan of the above-captioned reorganized debtors (the "Plan Administrator"). The deadline for parties to file a response to the Eighth Omnibus Objection was January 24, 2022 (the "Response Deadline").

---

<sup>1</sup> The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

2. After the filing of the Eighth Omnibus Objection, counsel for the Plan Administrator received certain informal comments to the proposed order approving the Eighth Omnibus Objection, which informal comments were addressed and resolved by agreement.

3. Attached hereto as **Exhibit 1** is an amended proposed form of order (the “**Revised Proposed Order**”) which resolves all known informal comments received by the Plan Administrator regarding the Eighth Omnibus Objection and no formal responses were filed on the Court’s Docket prior to the Objection Deadline. A redline reflecting changes from the proposed form of order filed with the Eighth Omnibus Objection to the Revised Proposed Order is attached hereto as **Exhibit 2**.

Dated: January 26, 2022

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner, Esq.

(TX Bar No. 00792304)

**PACHULSKI STANG ZIEHL & JONES LLP**

440 Louisiana Street, Suite 900

Houston, TX 77002

Telephone: (713) 691-9385

Facsimile: (713) 691-9407

Email: [mwarner@pszjlaw.com](mailto:mwarner@pszjlaw.com)

*Counsel for the Plan Administrator*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 26<sup>th</sup> day of January, 2022, a true and correct copy of the above and foregoing has been served by electronic transmission to all registered CM/ECF users appearing in these cases.

/s/ Michael D. Warner

Michael D. Warner, Esq.